

**UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND**

UNITED STATES OF AMERICA)	
v.)	Criminal No. 1:11-cr-00186-S
JOSEPH CARAMADRE, and RAYMOUR RADHAKRISHNAN)	

**MOTION TO STAY PROCEEDINGS TO PERMIT ADJUDICATION
OF MOTION TO WITHDRAW PLEA**

Now comes the Defendant, Joseph Caramadre, through counsel, and hereby moves this Honorable Court to stay all proceedings currently pending in the above-referenced matter to permit him to file a motion to withdraw his guilty plea, pursuant to Rule 11(d)(2)(B) of the Federal Rules of Criminal Procedure.¹

The initial sentencing hearing date is currently February 8, 2013. Undersigned counsel yesterday entered his appearance as successor counsel, after being retained Tuesday night to perfect the motion to withdraw his plea. It is anticipated that the trial transcript will be received today, and Mr. Caramadre will file his motion to withdraw his plea prior to the February 8 sentencing date, as required by rule.

Mr. Caramadre therefore respectfully requests that the post-plea proceedings be temporarily stayed to permit the completion and filing of the motion to withdraw his plea.

¹ Mr. Caramadre's objections to the pre-sentence report are currently due on January 18, 2013. He respectfully requests that this deadline be stayed pending the adjudication of his motion as well.

Respectfully submitted,
Joseph Caramadre,
By his attorney,

/s/Randy Olen, Esq.

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CERTIFICATION

I hereby certify that on this 11th day of January, 2013, I caused to be delivered, via electronic delivery, the within ***Motion*** to:

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/s/Randy Olen, Esq.
